

1 A Yes. 12:28:38	1 THE COURT REPORTER: The answer was yes. 12:30:25
2 MR. IVIE: Objection; leading. 12:28:39	2 MR. SWEENEY: Thank you. 12:30:28
3 Excuse me, Mr. Gonzalez. I'm making an 12:28:40	3 BY MR. SWEENEY: 12:30:29
4 objection. Can you wait until I'm finished? 12:28:43	4 Q The last sentence in that paragraph on Page 1 of 12:30:36
5 THE WITNESS: Yes, sir. 12:28:45	5 10: "The gang members communicate exclusively through 12:30:42
6 MR. IVIE: Objection; it's leading; suggestive; and 12:28:46	6 WhatsApp, an encrypted messaging app on their phones." 12:30:48
7 no foundation for the witness's testimony; calls for a 12:28:49	7 Is that true? 12:30:50
8 conclusion. 12:28:51	8 MR. IVIE: Again, objection; leading; suggestive; no 12:30:51
9 MR. ROMERO: This is counsel for the deponent. I'm 12:28:52	9 foundation; calls for a conclusion on the part of this 12:30:54
10 going to interpose my own objection. We seem to be 12:28:56	10 witness. 12:30:57
11 getting from Mr. Ivie the same objection for every 12:28:58	11 BY MR. SWEENEY: 12:30:58
12 single question. It's resulting in a disruption to the 12:28:59	12 Q Is that true, sir? 12:30:59
13 testimony, I believe. 12:29:02	13 A Yes. 12:30:59
14 I'm going to ask the deponent, are these 12:29:04	14 Q All right. And how do you know that? 12:31:00
15 objections disrupting your testimony, sir? 12:29:07	15 A There was an incident where a phone was left 12:31:03
16 THE WITNESS: They are. 12:29:10	16 behind in dispatch to be charged, to charge the phone, 12:31:09
17 MR. ALTURA: So I'd ask that we get a standing 12:29:11	17 and the watch deputy came and told a few of us that 12:31:14
18 objection since 99 percent of the objections have been 12:29:13	18 that's how the inked communicated. Because they left 12:31:23
19 the same. I don't mean to be disrespectful. Perhaps 12:29:16	19 the WhatsApp app open or the phone unlocked and then 12:31:27
20 after lunch, we can reconvene with the standing 12:29:19	20 messages started popping up regarding -- well, 12:31:31
21 objection because it's very hard even for me to follow. 12:29:21	21 communication with other inked members of this group 12:31:35
22 Thank you. 12:29:24	22 through WhatsApp. 12:31:40
23 MR. IVIE: Okay. So I'm not going to agree to that, 12:29:24	23 Q Okay. Does that indicate to you that it's a 12:31:43
24 but you've made your record. 12:29:26	24 secretive society? 12:31:48
25 /// 12:29:26	25 MR. IVIE: Objection; leading; suggestive; no 12:31:50
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1 BY MR. SWEENEY: 12:29:26	1 foundation; calls for speculation on the part of this 12:31:52
2 Q Okay. So is that true, Deputy, what I just 12:29:29	2 witness. 12:31:55
3 read? 12:29:34	3 THE WITNESS: Yes. 12:31:57
4 MR. IVIE: Again, it calls for a conclusion. 12:29:34	4 MR. SWEENEY: Okay. Let's take our break. It's 12:31:57
5 MR. SWEENEY: You got your objection in. 12:29:37	5 12:30, and we'll be back at what? Mr. Ivie said 1:15? 12:32:02
6 MR. IVIE: Well, then why are you repeating the 12:29:39	6 MR. IVIE: Yes. 12:32:08
7 question? 12:29:43	7 MR. ROMERO: Before we go off the record, I'd just 12:32:09
8 MR. SWEENEY: Because he doesn't recall it. 12:29:44	8 like to state that these continued objections by 12:32:11
9 MR. IVIE: Okay. If you're going to repeat the 12:29:45	9 Mr. Ivie are making this deposition completely 12:32:13
10 question, I'm going to restate my objection. 12:29:47	10 impossible by the deponent, and they're disruptive, they 12:32:16
11 MR. SWEENEY: But, Mr. Ivie -- 12:29:49	11 are disorienting, and I have a headache just trying to 12:32:20
12 MR. IVIE: The process is you ask the question, I 12:29:51	12 get through them. I'm not trying to be disruptive. I 12:32:24
13 object. 12:29:56	13 want to make sure the deponent gets the best testimony 12:32:26
14 BY MR. SWEENEY: 12:29:56	14 on the record for all sides. 12:32:29
15 Q Do you recall the question? 12:29:59	15 MR. SWEENEY: I concur. And welcome to the world of 12:32:30
16 A Yes, I do. 12:30:01	16 Mr. Rickey Ivie. That's been his style. 12:32:33
17 Q Okay. Is that true? 12:30:01	17 MR. IVIE: Welcome to the world of making appropriate 12:32:36
18 A Yes. 12:30:03	18 objections at a deposition. 12:32:39
19 MR. IVIE: Again, objection; it calls for a 12:30:04	19 MR. SWEENEY: Thank you, Mr. Ivie. 12:32:40
20 conclusion on the part of this witness; and there's no 12:30:07	20 MR. IVIE: It's leading; suggestive; and lacks 12:32:42
21 foundation. 12:30:09	21 foundation. 12:32:44
22 MR. SWEENEY: You've objected, Mr. Ivie. Thank 12:30:10	22 MR. SWEENEY: Thank you, Mr. Ivie. 12:32:44
23 you. 12:30:13	23 MR. IVIE: You're welcome. 12:32:46
24 Did you get the answer Madame Court Reporter -- I'm 12:30:15	24 MR. SWEENEY: Have a good lunch. 12:32:47
25 sorry -- Mr. Court Reporter? I'm sorry. 12:30:22	25 MR. IVIE: All right. You too. 12:32:49
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<p>1 THE VIDEOGRAPHER: This marks the end of 12:32:50 2 Media Unit No. 4. The time is 12:32, and we are off the 12:32:53 3 record. 12:32:55 4 (Recess taken from 12:32 p.m. to 1:32 p.m.) 13:32:50 5 THE VIDEOGRAPHER: This marks the beginning of 13:32:50 6 Media No. 5. The time is 1:32 p.m., and we are on the 13:32:54 7 record. 13:32:56 8 BY MR. SWEENEY: 13:32:57 9 Q Good afternoon, Deputy. 13:32:59 10 A Good afternoon, sir. 13:33:01 11 Q What I'm going to do now is, to make this go 13:33:02 12 quicker, we're going to put up the Exhibit 105 and we're 13:33:07 13 just going to go line by line, and I'm going to ask you 13:33:12 14 questions about it. 13:33:20 15 All right. At the top, can you see it, Deputy? 13:33:21 16 A Yes. 13:33:23 17 Q Okay. At the top, it says: "The Executioners, 13:33:24 18 led by inked shot caller Deputy Jaime Juarez, have 13:33:29 19 paralyzed Compton through their use of violence against 13:33:35 20 deputies and threats of illegal work slowdowns, by which 13:33:39 21 Executioners members and associates at Compton will 13:33:45 22 purposefully cease some or all of their law enforcement 13:33:49 23 duties while continuing to be paid in order to impose 13:33:54 24 their will upon Compton by force." 13:33:59 25 Let me ask you a question about this. You 13:34:04</p>	<p>1 Q It goes on to say: "Deputy Anthony Bautista" -- 13:35:50 2 I'm sorry -- "an inked member of the Executioners, 13:36:01 3 Deputy Anthony Bautista." Is that true? 13:36:07 4 A Yes. 13:36:10 5 Q Okay. Sorry about that. 13:36:11 6 What effect did that have on the policy and 13:36:19 7 runnings of the -- strike that -- on the inner workings 13:36:26 8 of the Compton station? 13:36:30 9 A Well, I mean, the Scheduling and Training Deputy 13:36:32 10 position is huge. Jaime Juarez had this position for a 13:36:36 11 number of years where it allowed him to -- where it 13:36:43 12 allowed him to give overtime spots, variances of, you 13:36:52 13 know, days off and move around deputies as he pleased 13:36:57 14 because, you know, he was the Scheduling Deputy. I 13:37:04 15 mean, he made the schedules. He controlled the 13:37:09 16 schedules. And, you know, the sergeant who was in 13:37:13 17 charge of him gave him free will, you know. So, you 13:37:17 18 know, he had the experience. He knew what that position 13:37:23 19 was all about and, you know, it's a position of control 13:37:25 20 at the station. 13:37:30 21 Q Let me ask you this. Is it common knowledge at 13:37:31 22 the station that the sergeants are frightened of 13:37:33 23 The Executioners? 13:37:41 24 A The sergeants allow it. It's common knowledge 13:37:42 25 that sergeants allow, you know, this group to basically 13:37:46</p>
<p>Page 82</p> <p>1 already said or you already made a comment about this. 13:34:08 2 You already said that Deputy Jaime Juarez is the shot 13:34:11 3 caller of the gang; correct? 13:34:15 4 A Yes. 13:34:17 5 Q Okay. Is it true, after that, you see 13:34:17 6 Deputy Juarez, his name and there's a comment. Is that 13:34:22 7 true, all that I read to the end of that sentence? 13:34:27 8 A Yes. 13:34:30 9 MR. SWEENEY: Okay. What happened? Oh, okay. All 13:34:31 10 right. Thank you. 13:34:35 11 BY MR. SWEENEY: 13:34:57 12 Q Okay. Next sentence: "One such work slowdown 13:34:57 13 occurred in 2019, when shot caller Juarez, a Deputy, 13:35:01 14 confronted Acting Captain Larry Waldie." 13:35:06 15 Was there a confrontation between the two? 13:35:11 16 A Yes. Yes, there was. 13:35:18 17 Q A verbal confrontation; is that correct? 13:35:20 18 A Just an altercation, verbal. 13:35:24 19 Q Okay. And did the following happen: "Juarez 13:35:26 20 informed Waldie that he, and by extension 13:35:30 21 The Executioners gang that he presided over, was 13:35:33 22 demanding that the Training and Scheduling Deputy, 13:35:38 23 Wanda Valiente, be replaced with an inked member of 13:35:44 24 The Executioners." Is that true? 13:35:47 25 A Yes. 13:35:50</p>	<p>1 do whatever they want. 13:37:49 2 Q Would you say that this group is -- do you know 13:37:52 3 the term "de facto" -- in reality, in control of the 13:38:00 4 station, this group? 13:38:04 5 A Yes. Yes, absolutely. 13:38:06 6 Q Okay. It goes on to say: "The Training and 13:38:08 7 Scheduling Deputy position was enormously desirable to 13:38:17 8 the gang as that position would be able to dole out 13:38:20 9 preferred shifts and inked" -- I'm sorry -- "to inked 13:38:24 10 gang members, as well as provide them with any days off 13:38:30 11 that they would desire." Is that true? 13:38:34 12 A Yes. 13:38:36 13 Q And it goes on to say: "All to the extreme 13:38:37 14 prejudice of non-gang members, who would be disproportionately 13:38:48 15 and negatively impacted by the most desirable scheduling 13:38:54 16 being funneled exclusively to the gang." Is that true? 13:38:58 17 A Yes. 13:39:02 18 Q It goes on to say: "Lieutenant Waldie 13:39:03 19 immediately put his foot down and advised Juarez that he 13:39:08 20 would not be intimidated into carrying out his duties 13:39:13 21 based upon the desires of The Executioners." Is that 13:39:17 22 true? 13:39:21 23 A Yes. 13:39:21 24 Q How did you find that out? 13:39:21 25 A Every -- the whole station knew about it. 13:39:23</p>

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1 Everybody knew about it. In fact, I, you know, had a 13:39:26
 2 little -- I ran into Acting Captain, Lieutenant Waldie, 13:39:30
 3 and, you know, I asked him, "Is this true? The line is 13:39:35
 4 talking about this. Is this true?" And he confirmed 13:39:40
 5 it. 13:39:43
 6 Q Okay. "In retaliation, Juarez, 13:39:45
 7 The Executioners, and their associates at Compton 13:39:55
 8 implemented the threatened work slowdown wreaking havoc 13:39:59
 9 in Compton and resulting in enormous losses to County 13:40:06
 10 taxpayers, and these individuals who participated in the 13:40:09
 11 slowdown received their full public salaries for doing 13:40:13
 12 little or no work." Is that true? 13:40:17
 13 A Yes. 13:40:19
 14 Q You know that because -- 13:40:20
 15 A There was nobody being arrested. Very minimal 13:40:25
 16 arrests were being done at that time. We have a booking 13:40:29
 17 line. We would hardly ever see a unit in the booking 13:40:32
 18 line with, you know -- you know, with suspects in their 13:40:37
 19 back seats. It was so obvious that, you know, we all 13:40:41
 20 noticed that. 13:40:45
 21 Q Would you say that the public was in danger 13:40:46
 22 because of the actions of these Executioners with the 13:40:51
 23 work slowdowns? 13:40:55
 24 A Well, there's no -- you know, if there's no 13:40:57
 25 police presence out in the street and they're parked 13:41:01

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1 Q He did know? 13:42:52
 2 A Oh, yes, he was aware of them. He knew about 13:42:54
 3 them. 13:42:56
 4 Q How do you know that? 13:42:56
 5 A Shortly after Aldama's deposition regarding the 13:42:57
 6 -- I believe it was the Taylor case, Commander -- well, 13:43:02
 7 Captain Thatcher then sent out an e-mail basically 13:43:09
 8 saying that if you could not explain your way out of a 13:43:12
 9 tattoo -- or maybe you should learn how to articulate 13:43:15
 10 why you got a tattoo. 13:43:20
 11 Q How did you take that when you received that 13:43:24
 12 e-mail? When I say "take that", what was going through 13:43:28
 13 your mind? 13:43:31
 14 MR. IVIE: Counsel, the witness didn't finish his 13:43:32
 15 answer to your question. 13:43:35
 16 MR. SWEENEY: I'm sorry. 13:43:36
 17 MR. IVIE: Can you let the witness finish the answer? 13:43:37
 18 MR. SWEENEY: I'm sorry, Mr. Ivie. 13:43:39
 19 BY MR. SWEENEY: 13:43:41
 20 Q Were you finished? 13:43:41
 21 A Yes. It was, you know, that there was an e-mail 13:43:42
 22 that Captain Thatcher at the time sent out to the 13:43:46
 23 station. 13:43:51
 24 Q Did Captain Thatcher work -- prior to the e-mail 13:43:51
 25 coming out, did Captain Thatcher work closely with those 13:44:02
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1 somewhere, then I would say yes. 13:41:07
 2 Q You go on to say or it goes on to say in your 13:41:10
 3 claim here, Exhibit 105: "Lieutenant Waldie, after 13:41:17
 4 notifying his superior, Captain Michael Thatcher, 13:41:23
 5 instigated a punitive transfer of gang leader Juarez to 13:41:27
 6 Industry station, but Lieutenant Waldie was later 13:41:34
 7 overruled and Juarez was allowed to return to his gang 13:41:38
 8 home base in Compton." Is that true? 13:41:42
 9 A Yes. 13:41:45
 10 Q So do you know who allowed -- strike that. 13:41:45
 11 Do you know who approved the transfer back of 13:41:56
 12 Juarez to the Compton station? 13:41:59
 13 A Well, sir, I know it wasn't the 13:42:02
 14 Acting Captain, Lieutenant Waldie. The person above him 13:42:05
 15 is -- was Commander Thatcher, and then Michael Thatcher 13:42:11
 16 -- and then above him, the division chief, who was 13:42:18
 17 Eli Vera. So, you know, I'm not there, I'm not up 13:42:23
 18 there, but there's a chain of command in our department, 13:42:25
 19 so -- I know our acting captain didn't want Juarez back 13:42:27
 20 and nobody at the station wanted Juarez back. It was -- 13:42:35
 21 you know, we felt relieved when he wasn't at the 13:42:39
 22 station. 13:42:42
 23 Q By the way, do you know if Captain Thatcher knew 13:42:42
 24 of the existence of The Executioners? 13:42:47
 25 A Yes. 13:42:52

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1 who were in charge of The Executioners, like the shot 13:44:06
 2 callers and the higher-ups? 13:44:10
 3 A Well, he was our Captain, and 13:44:12
 4 Deputy Jaime Juarez was our Scheduling Deputy so, you 13:44:19
 5 know, there is somewhat of a close supervisory, you 13:44:21
 6 know, relationship. 13:44:28
 7 Q Okay. In your mind, is there any way in your 13:44:33
 8 mind -- you know the inner workings of the Compton 13:44:41
 9 station -- that Captain Thatcher could not have been 13:44:44
 10 knowledgeable about this gang before 2018 when it was 13:44:46
 11 revealed, this tattoo? 13:44:49
 12 A Let me see if I understand your question 13:44:53
 13 correctly. So you're saying -- basically, you're asking 13:44:56
 14 if Captain Thatcher had any knowledge of this group of 13:44:58
 15 deputies prior to Aldama's deposition? 13:45:03
 16 Q In your mind because you know the inner workings 13:45:07
 17 and what was going on with the work slowdowns, what's 13:45:12
 18 your answer to that? 13:45:15
 19 A Yes, he had knowledge. 13:45:15
 20 Q Okay. I noticed that -- strike that. 13:45:18
 21 Did you ever you take any pictures of any of the 13:45:31
 22 tattoos depictions? 13:45:34
 23 A Yes. 13:45:38
 24 Q And what was that? 13:45:38
 25 A It was a picture of, you know, the tattoo, but 13:45:41
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<p>1 it was on a mouse pad and, like, a pencil holder, along. 13:45:45 2 I think, with a mouse, you know, with the tattoo's 13:45:52 3 logo. 13:45:57 4 MR. SWEENEY: Okay. We're going to up pull up 13:45:58 5 another exhibit. I think we're up to 108; is that 13:46:00 6 correct? 13:46:04 7 MR. GLICKMAN: This would be 109. 13:46:04 8 MR. SWEENEY: I'm sorry. 109. Can you see -- 13:46:06 9 Mr. Glickman, can you blow it up a little bit? 13:46:10 10 MR. GLICKMAN: Just give me one second. It should be 13:46:13 11 on the screen now. 13:46:36 12 BY MR. SWEENEY: 13:46:37 13 Q Okay. Is that a picture you took, sir? 13:46:38 14 A Yes, sir. 13:46:41 15 Q And whose desk is that; do you know? 13:46:42 16 A That was Deputy Bautista. 13:46:47 17 Q And how long, if you know -- strike that. 13:46:51 18 Approximately what date did you first see that 13:46:57 19 mouse pad and pencil holder? 13:47:01 20 A I saw it after -- I want to say it was around 13:47:04 21 the month of May of the present year. 13:47:09 22 Q Okay. Do you know where he got it made? 13:47:12 23 A Where he got it made? No, I don't know. One 13:47:17 24 day, I just came to pick up files, and I noticed -- you 13:47:20 25 know, I noticed the mouse pad and the mouse, and then 13:47:24</p>	<p>1 of pressure to do so? 13:49:08 2 A Yes. Where it was, it was a division meeting 13:49:09 3 where captains from each station attend, and the word 13:49:14 4 was, because this was said in briefing by one of the 13:49:21 5 sergeants, that our captain, Captain Thatcher, had been 13:49:24 6 chewed out because Compton station's stats were very 13:49:29 7 low. 13:49:33 8 Q And so you said he was chewed out. That's what 13:49:39 9 you heard? 13:49:42 10 A Yeah. And I can't remember the sergeant, but in 13:49:42 11 a briefing, they said that the captain had his ass 13:49:45 12 chewed out. That's what they said. 13:49:48 13 Q And now that we're on that -- let's go ahead and 13:49:50 14 (inaudible) but now that we're on that, what was done as 13:49:57 15 a result of him being chewed out, if you know? 13:50:00 16 A Well, captain came back to the station and, you 13:50:04 17 know, lieutenants and the scheduling sergeant, they 13:50:11 18 started asking for stats, asking to arrest people. If 13:50:21 19 you're not arresting people, you know, you're going to 13:50:26 20 be put in traffic cars and front counter positions, you 13:50:29 21 know, less desirable positions. 13:50:35 22 Q Okay. Let's skip to Page 3, the fourth 13:50:37 23 paragraph down, because that's where you talk about 13:50:45 24 that. Let me ask you if this is true. 13:50:48 25 "In August or September of 2017, there was a 13:50:52</p>
<p>Page 90</p> <p>1 like a week later, I noticed it in two other deputies' 13:47:32 2 desk. 13:47:36 3 Q Okay. And who were the two other deputies? 13:47:37 4 A Deputy Reza and Deputy Jimenez. 13:47:40 5 Q Okay. Do you know if now Commander Thatcher is 13:47:45 6 a member of one of these clique gangs in the 13:47:57 7 Sheriff's Department? 13:48:03 8 A No. 13:48:03 9 Q You do not know? 13:48:04 10 A I don't know. 13:48:05 11 Q Had you heard -- strike that. 13:48:07 12 Have you heard of The Regulators? 13:48:12 13 A I've heard of them, yes. 13:48:14 14 Q Have you heard of The Vikings? 13:48:16 15 A Yes, sir. 13:48:19 16 Q Did you ever ask Captain Thatcher why he was 13:48:20 17 sympathetic to The Executioners? 13:48:33 18 A No, sir. 13:48:37 19 Q Did you ever wonder? 13:48:37 20 A At first I did, but then after certain events 13:48:39 21 happened, I understood why there was -- he was 13:48:48 22 sympathetic to the group. 13:48:51 23 Q And why was that? 13:48:53 24 A Because they boosted his stats at the station. 13:48:55 25 Q Okay. And at some point was he under any kind 13:48:59</p>	<p>Page 92</p> <p>1 meeting with various captains at the division level, and 13:50:54 2 Thatcher was reprimanded for the arrest statistics being 13:50:59 3 low at Compton." You just testified to that; correct? 13:51:04 4 A Yes, sir. 13:51:07 5 Q Okay. How many stations are in a division? 13:51:07 6 A I believe five. 13:51:13 7 Q And they are? 13:51:14 8 A Compton Station, Century Station, 13:51:16 9 Marina Del Rey, Eastlake Station, and I believe 13:51:22 10 South Lake Station. 13:51:27 11 Q Okay. You go on to say or the claim goes on to 13:51:27 12 say: "Thatcher reacted by implementing an illegal 13:51:33 13 arrest quota framework at Compton, in violation of 13:51:38 14 California law, Vehicle Code Section 41602." 13:51:40 15 Now, at some point did you find out prior to you 13:51:47 16 submitting this claim that it was, in fact, illegal to 13:51:54 17 set arrest quotas? 13:51:58 18 A Yes. 13:52:00 19 Q And it goes on to say: "Thatcher sought the 13:52:00 20 assistance of Juarez and the gang resulting in Compton 13:52:12 21 arrest statistics increasing by an approximate 13:52:15 22 300 percent within a month." Is that what happened? 13:52:21 23 A Yes, they more than doubled/ I don't remember 13:52:23 24 the exact numbers. But we know it was a very dramatic 13:52:26 25 increase. There was a graph shown in the briefing room. 13:52:31</p>

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<p>1 And it shows all the arrests made for a year to the 13:52:39 2 present date, then for the year before and the present 13:52:46 3 year, and you could see -- I mean, you could see how 13:52:50 4 much larger that graph for the present year was. It 13:52:55 5 more than doubled. 13:53:01</p> <p>6 Q And that was shown at a meeting at the Compton 13:53:02 7 station? 13:53:05</p> <p>8 A Well, it was just posted in the briefing room. 13:53:05</p> <p>9 Q And you said that Thatcher sought the assistance 13:53:09 10 of Juarez and the gang. How do you know that? 13:53:15</p> <p>11 A I -- well, I was partnered with Deputy Vargas, 13:53:17 12 who is or was -- was and probably still is Juarez's 13:53:27 13 girlfriend. While partnered, we conducted a traffic 13:53:33 14 stop. Another unit pulled up behind us, and normally 13:53:41 15 for the infraction that the driver had committed, we 13:53:49 16 wouldn't have arrested the driver. We would have 13:53:55 17 probably just, you know, more than likely just warned 13:53:59 18 and advised. 13:54:03</p> <p>19 She started filling out a citation to cite and 13:54:04 20 release the arrest in the field, and I did ask 13:54:12</p> <p>21 Deputy Vargas what she was doing because, you know, this 13:54:16 22 was very unusual. And she said, "A stats a stat and, 13:54:19 23 you know, you better start -- you better start padding 13:54:23 24 your stats or getting your stats." 13:54:30</p> <p>25 Q Did she say -- did she appear to be doing the 13:54:33</p>	<p>1 Q It sounds like that you are saying in your claim 13:56:04 2 that Thatcher was being controlled by this gang; is that 13:56:08 3 true? 13:56:13</p> <p>4 A Well, that and, you know, word is that, you 13:56:13 5 know, we all believed that Captain Thatcher got his star 13:56:20 6 because of the gang. He was able to get promoted 13:56:24 7 because -- you know, because the gang was enforcing 13:56:27 8 these, you know, arrest quotas and stats which 13:56:32</p> <p>9 ultimately, when Thatcher went back to another meeting, 13:56:34 10 you know, it shows that he had -- you know, that he was 13:56:39 11 able to bring up his stats and, you know, then after get 13:56:43 12 his star as commander. 13:56:49</p> <p>13 Q So you think he became -- strike that. 13:56:50</p> <p>14 Do you believe that this gang had that much 13:56:56 15 influence over the Sheriff's Department, that they can 13:56:59 16 control a captain's actions and policy within the 13:57:04 17 station and then get rewarded by being promoted to the 13:57:09 18 commander level; is that what you're saying? 13:57:14</p> <p>19 A I think they have a pretty far reach within the 13:57:15 20 department. 13:57:18</p> <p>21 Q I'm sorry. What's that? 13:57:18</p> <p>22 A I think they have a pretty far reach within the 13:57:20 23 department, yes. 13:57:22</p> <p>24 Q That is, the gang. 13:57:23</p> <p>25 Okay. And I want to read this paragraph really 13:57:28</p>
<p>Page 94</p> <p>1 bidding of her boyfriend, the shot caller? 13:54:36</p> <p>2 A Well, she had been given -- word was that she 13:54:39 3 had been given the heads-up a couple of weeks before so 13:54:45 4 she could pad her stats, and when the punishment came 13:54:48 5 because you're not arresting people to put you in 13:54:54 6 traffic, she would be able to show that, you know, she 13:54:57 7 had been arresting people for the last two to three 13:54:59 8 weeks. 13:54:59</p> <p>9 Q How did you feel about that as far as ethics are 13:55:03 10 concerned, about arresting people who had not done 13:55:07 11 anything just to get stats up? How did you feel about 13:55:11 12 that? 13:55:14</p> <p>13 A Well, it's not so much for people not doing 13:55:14 14 anything, but, you know, my opinion was, you know, 13:55:20 15 there's letter of the law and spirit of the law, and 13:55:22 16 during that period there was no spirit of the law 13:55:26 17 whatsoever. 13:55:28</p> <p>18 Q Now, you say down further in that paragraph: 13:55:29 19 "During that time period, Vargas would begin to make 13:55:43 20 very unusual misdemeanor arrests, usually arresting 13:55:46 21 individuals and then immediately releasing them in the 13:55:52 22 field for no other purpose but to juke the arrest 13:55:54 23 statistics as a favor from the gang to Thatcher." Is 13:55:58 24 that correct? 13:56:02</p> <p>25 A Yes, sir. 13:56:02</p>	<p>Page 96</p> <p>1 quickly. "Back in 2016, Claimant attempted to get 13:57:44 2 scheduled to have certain days off so he can provide 13:57:49 3 medical care to his daughter, Caitlynne, on those days. 13:57:52 4 At this time Juarez was a Training and Scheduling Deputy 13:57:55 5 who operated the station scheduling in a manner to 13:58:01 6 benefit his gang. Claimant, a non-member of the gang, 13:58:04 7 was refused these days off by Juarez. Claimant had no 13:58:07 8 other option at this point but to go out on CFRA/FMLA 13:58:12 9 leave, as his superiors, with whom he discussed his 13:58:19 10 situation with, refused to or otherwise lacked the 13:58:24 11 ability to confront Juarez as he was a leader of the 13:58:27 12 station gang and rarely subjected to meaningful 13:58:32 13 supervision or control by his supervisors due to his 13:58:35 14 gang ties." Is that true? 13:58:40</p> <p>15 A Yes, sir. 13:58:41</p> <p>16 Q And that happened to you; correct? 13:58:42</p> <p>17 A Yes, sir. 13:58:46</p> <p>18 Q All right. Final paragraph on this page: "At 13:58:47 19 this time gang shot caller, Juarez, as the Training and 13:58:55 20 Scheduling Deputy, changed Claimant's schedule to the 13:58:59 21 early morning shift to accommodate an Executioner 13:59:02 22 member, all of whom received preferential scheduling 13:59:07 23 consideration over non-gang members or associate s." Is 13:59:12 24 that true? 13:59:16</p> <p>25 A Yes, sir. The deputies that he accommodated for 13:59:16</p>

<p>1 continue seeing my daughter, otherwise, I was falling on 14:05:20 2 the opposite end of the week and would be working on the 14:05:23 3 days that I would have my daughter. 14:05:26 4 Q Okay. All right. So the last sentence in that 14:05:28 5 paragraph, the last paragraph on Page 2, it says: 14:05:35 6 "Claimant protested to his supervisor, Sergeant Lopez, 14:05:38 7 then the Scheduling and Training Sergeant at Compton, 14:05:43 8 but Lopez refused to consider the basis for Claimant's 14:05:46 9 objection and informed him that he would support 14:05:50 10 Juarez's erroneous decision." Is that true, first of 14:05:53 11 all? 14:05:58 12 A Yes. 14:05:58 13 Q And why do you figure that Lopez was supporting 14:05:59 14 Juarez's decision? Don't speculate. If you know. 14:06:07 15 A I don't know why he would -- I don't know why he 14:06:11 16 was worried. And what he told me is, "Did you talk to 14:06:16 17 Juarez already?" I said, "Yes, sir, I did." And then 14:06:19 18 he said, "Well, whatever he says, I'm going to support 14:06:23 19 it." 14:06:26 20 Q Did it appear that Juarez was running the 14:06:26 21 station? 14:06:31 22 A Yes. 14:06:33 23 Q Okay. Going down to the second paragraph on 14:06:34 24 Page 3, it says: "The Executioners also had a pattern 14:06:49 25 and practice of showing preference to prospective 14:06:53 Page 102 </p>	<p>1 very comfortable with them, no discipline, no bearing, 14:08:39 2 you know, things of that nature. So you start seeing 14:08:47 3 and, you know, common start, you know, to go around 14:08:50 4 saying, "Oh, he's definitely going to be a prospect when 14:08:53 5 he gets off training. Oh, I guarantee he will 14:08:57 6 definitely get off training." 14:09:00 7 Q Do you believe that they are -- that the 14:09:02 8 Executioner gang is grooming these prospects to become 14:09:06 9 Executioners? 14:09:12 10 A Yes. 14:09:12 11 Q And do you believe they're training them in 14:09:14 12 their illegal ways that you just spoke of? 14:09:20 13 A Yes. I mean, we lead by example, they say. 14:09:22 14 Q Yeah. It goes on to say: "Further prospects 14:09:29 15 are allowed to skip assignments or have their 14:09:33 16 assignments shortened to the non-preferred traffic or 14:09:37 17 Compton Town Center Mall substation detail. Claimant, 14:09:41 18 as an example, was assigned to traffic duty for a period 14:09:45 19 of 12 to 14 months as he was not interested in becoming 14:09:48 20 a gang prospect." Is that true? 14:09:52 21 A Yes. 14:09:56 22 Q Do you feel that you got a lousy assignment or a 14:09:56 23 non-preferential assignment because you showed no 14:10:04 24 interest in being a gang member? 14:10:07 25 A Yes. 14:10:09 Page 104 </p>
<p>1 members as soon as they were assigned to Compton." Is 14:06:56 2 that true? 14:06:59 3 A Yes. 14:06:59 4 Q "Once identified as prospects to become inked 14:07:00 5 members, newly assigned Compton deputies were allowed to 14:07:06 6 partner up with inked members right away while all other 14:07:10 7 newly minted patrol deputies were required to work by 14:07:16 8 themselves for long periods of time." Is that true? 14:07:21 9 A Yes. 14:07:23 10 Q Why do you believe -- strike that. 14:07:24 11 Why do you say that? Why are prospects allowed 14:07:25 12 to work with inked members; why do you feel that? 14:07:30 13 A Well, it was a combination of allowing, like, 14:07:35 14 for example, two prospects to jump in one car and work, 14:07:40 15 as well as they got off training and they were, you 14:07:46 16 know, able to go and work with inked members. You know, 14:07:50 17 I was -- I wasn't assigned a partner when I got off 14:07:56 18 training, and a lot of non-inked members were not 14:08:00 19 allowed -- or not allowed but weren't given that 14:08:04 20 same opportunity. 14:08:09 21 Q Let me ask you this. How are prospects 14:08:10 22 identified? How are they identified? 14:08:14 23 A Well, I mean, when they are in training, you can 14:08:19 24 see their demeanor on how they are with the 14:08:27 25 station, with, you know, inked members, very easy going, 14:08:33 Page 103 </p>	<p>1 Q Did they ever try to recruit you and say come on 14:10:10 2 to the program? 14:10:14 3 A No. 14:10:15 4 Q They just knew that you were strait-laced and -- 14:10:15 5 strike that. That calls for speculation. 14:10:19 6 Did you let everyone know at the station that 14:10:22 7 you played by the book? 14:10:25 8 A Well, I did my job. I did it -- I mean, I 14:10:27 9 believe maybe they didn't ask me because I didn't come 14:10:31 10 from Custody. I came from Court Services. But, again, 14:10:35 11 that's my reason. I don't know why they never asked me. 14:10:39 12 Maybe it's because the incident that happened between 14:10:42 13 Juarez and I where I kept asking for the days off that I 14:10:45 14 needed and, you know, maybe he just didn't like me for 14:10:51 15 that. Honestly, I don't know why they never asked me, 14:10:56 16 but I was never approached. 14:10:59 17 Q Okay. So have you heard of the 3,000 Unit on 14:11:00 18 Bauchet Street? 14:11:09 19 A Say that one more time? 14:11:09 20 Q Have you heard of the 3000-level Unit in 14:11:11 21 Men's Central at Bauchet Street? 14:11:15 22 A Yes, sir. 14:11:17 23 Q Have you heard of the 2000 Unit at 14:11:18 24 Men's Central Jail at Bauchet Street? 14:11:24 25 A Yes, sir. 14:11:28 Page 105 </p>

1 Q Do you know whether or not, if you know, the 2 2000 or 3000 Unit deputies are sent to the Compton 3 station, if you know? 14:11:41	14:11:28	1 here about the quota system, John? 14:14:51
4 A Well, I know that they're not sent there. They 5 -- you know, the department allows you to pick a number 14:11:46 6 of stations, and based on your departmental seniority is 14:11:51 7 when you get to go to whatever pick you have depending 14:11:55 8 on the needs of the department. I know that a lot of 14:11:59 9 2000 and 3000 floor deputies desired to come to the 14:12:04 10 Compton station. 14:12:10	14:11:31	2 MR. SWEENEY: Yeah. 14:14:56
11 Q Okay. All right. Then it goes on to say in 14:12:11 12 Paragraph 3: "Juarez eventually returned to Compton 14:12:20 13 from his IDT transfer." What is "IDT"? 14:12:23		3 BY MR. SWEENEY: 14:14:56
14 A Industry. That's the three-letter abbreviation 14:12:27 15 for City of Industry. 14:12:31		4 Q Yeah, let's talk about that real quickly. It 14:14:57
16 Q Okay. "This is believed to be an act of 14:12:32 17 gratitude shown by Captain Thatcher to Juarez for 14:12:38 18 assistance Juarez had previously directed his gang and 14:12:43 19 gang associates to provide to Thatcher." 14:12:46		5 says: "Days after the Wargo briefing where the deputies 14:15:00 6 were illegally ordered to meet arrest quotas or face 14:15:03 7 punish, Claimant, along with Deputies Jonathan Alcala 14:15:09 8 and Gabriel Guzman, complained about the illegality of 14:15:13 9 the quota order to the Acting Watch Commander, 14:15:18 10 Sergeant Andy Leos, as an unlawful idea to punish 14:15:24 11 deputies with low arrest stats originated from Juarez 14:15:29 12 and Leos." Is that true? 14:15:36
20 Now, how do you know this? I want to know why 14:12:49 21 this isn't just speculation. How do you know this? 14:12:53		13 A Yes, sir. 14:15:38
22 A Well, I did ask Lieutenant Waldie, you know. I 14:12:55 23 heard -- and, you know, the word goes out quick. This 14:12:59 24 is worse in high school. Word goes out quick. "Hey, 14:13:03 25 there's word that Juarez is coming back to Industry." I 14:13:06		14 Q You saw that happen? 14:15:38
	Page 106	15 A Yes, sir. I was there, yes. 14:15:41
		16 Q "When confronted by the deputies and asked if 14:15:43 17 undesirable assignments were being improperly used as 14:15:48 18 punishment for not meeting illegal quotas, Leos 14:15:51 19 admitted, 'Yes, you should have known that by 14:15:55 20 now.'" Did you hear him say that? 14:15:59
		21 A Yes. 14:16:00
		22 Q "Leos further stated that if someone had a 14:16:01 23 problem with the new quota program, that they were 14:16:05 24 welcome to come to his office so that Leos could show 14:16:09 25 them their low stats." Did he say that? 14:16:12
		Page 108
1 hear from one or two deputies, and then I ran into 14:13:09 2 Lieutenant Waldie in the parking lot, and I asked him, 14:13:14 3 "Hey, sir, we're hearing that Juarez is coming back." 14:13:17 4 And all he said was, "Not my call." 14:13:20		1 A Yes. 14:16:16
5 Q All right. Then we talked about the reference 14:13:22 6 in the office in August of 2017. We'll skip over it and 14:13:32 7 go quickly. 14:13:35		2 Q You heard him? 14:16:16
8 "Several weeks later, Lieutenant John Wargo held 14:13:35 9 a briefing and informed all deputies that their stats 14:13:38 10 were low compared to other stations in the 14:13:42 11 division. Claimant was present when Wargo told all the 14:13:45 12 deputies present in the briefing that it was their job 14:13:47 13 to arrest people, 'so go do your job.' After this 14:13:52 14 meeting deputies with low arrest numbers were retaliated 14:13:55 15 against and punished by having to work undesirable 14:13:58 16 details such as working the front desk, traffic detail, 14:14:02 17 or Compton Town Center Mall substation." Is that true? 14:14:05		3 A Yes, sir. 14:16:18
18 A Yes, sir. 14:14:11		4 Q It goes on to say: "Leos raised his voice to 14:16:18 5 Claimant and Deputies Alcala and Guzman and told them to 14:16:23 6 'do your job, I'm trying to save your career.'" How did 14:16:27 7 you take that, sir? 14:16:31
19 Q That happened? 14:14:11		8 A Well, I mean, go get arrests, you know, go get 14:16:31 9 your stats or else. I mean, it's a little vague, you 14:16:40 10 know, when he says to save your career but, to me, that 14:16:47 11 sounds like if I don't get arrest quotas, then -- I 14:16:52 12 don't know -- I may not get promoted, I may not go to a 14:16:59 13 good assignment, I may not ever get out of traffic. 14:17:02
20 A Yes, sir. 14:14:12		14 Q Okay. Let me finish this paragraph and we'll 14:17:06 15 take a five-minute break. 14:17:12
21 Q Moving on -- what I'm trying to do, Deputy, is 14:14:13 22 go over things that are not relevant to what I want to 14:14:36 23 talk about. 14:14:41		16 "As a result of this interaction" -- I'm 14:17:14 17 sorry. It goes on to say: "Alcala protested and said 14:17:16 18 he was doing his job, to service calls for assistance 14:17:22 19 from the public. As a result of this interaction, 14:17:27
24 A Yes, sir. 14:14:42		20 Claimant, Alcala, and Guzman were all reprimanded as 14:17:29 21 punishment for protesting the illegal quota program and 14:17:34 22 were demoted and immediately put on a rotation to 14:17:38 23 traffic duty." Is that true? 14:17:41
25 MR. GLICKMAN: Do you want to do this last paragraph 14:14:49		24 A Yes. It's not demoted. They were punished -- 14:17:42 25 we were punished in a way where we weren't able to work 14:17:48
	Page 107	Page 109

<p>1 a crime car and we were put in traffic in a traffic car. 14:17:52 2 Q Okay. It goes on to say: "Alcala had been 14:17:56 3 slated to promote to Special Assignments Office at 14:18:01 4 Compton, but after he protested to Leos, Leos informed 14:18:04 5 the sergeant, commanding SAO, to refuse the transfer to 14:18:08 6 Alcala." Is that true? 14:18:13 7 A Yes, sir. 14:18:14 8 MR. SWEENEY: All right. Why don't we take a 14:18:15 9 five-minute break and pick up here? Is that okay with 14:18:17 10 everybody? 14:18:20 11 MR. IVIE: Yeah. 14:18:22 12 MR. SWEENEY: Okay. 14:18:23 13 THE VIDEOGRAPHER: This marks the end of 14:18:24 14 Media No. 5. The time is 2:18 p.m., and we are off the 14:18:27 15 record. 14:18:29 16 (Recess taken from 2:18 p.m. to 2:29 p.m.) 14:29:24 17 THE VIDEOGRAPHER: This starts the beginning of 14:29:24 18 Media No. 6. The time is 2:29 p.m., and we are on the 14:29:27 19 record. 14:29:30 20 BY MR. SWEENEY: 14:29:30 21 Q Okay. The next paragraph says in your 14:29:32 22 Exhibit 105: "Due to this illegal arrest quota 14:29:39 23 regime, average arrests per deputy immediately went from 14:29:48 24 approximately 2.5 arrests per month to approximately 14:29:52 25 7 arrests per month." Is that true? 14:29:57</p>	<p>1 complaining was not going to get us anywhere. In fact, 14:31:40 2 Lieutenant Garrido came to one of our briefings and said 14:31:51 3 to stop complaining to the union and to do our F'ing 14:31:55 4 jobs, so there was nowhere to go and complain. 14:32:08 5 Q Okay. It goes on to say on October 25th -- 14:32:11 6 MR. GLICKMAN: You skipped a line. 14:32:25 7 BY MR. SWEENEY: 14:32:27 8 Q I'm sorry. "Finally, Thatcher called a meeting 14:32:27 9 with patrol deputies and told them he was pleased with 14:32:31 10 the results and new artificially inflated arrest 14:32:34 11 figures." Did you hear him say that? 14:32:38 12 A He went to a briefing and -- he went to a 14:32:40 13 briefing, and then a sergeant told us that he was 14:32:49 14 pleased, that he was, you know, happy, that he went back 14:32:52 15 to a division meeting and that it was good news. 14:32:54 16 Q Okay. And so this good news was brought about 14:33:00 17 by Thatcher to elicit the help of these gangsters; is 14:33:07 18 that true? 14:33:12 19 A Yes. 14:33:13 20 Q It goes on to say: "On October 25th, 2019, 14:33:13 21 Claimant was recognized for his long and diligent 14:33:19 22 service by being promoted to Field Training 14:33:22 23 Officer. Claimant received a 5 percent FTO pay 14:33:26 24 increase." Is that true? 14:33:29 25 A Yes, sir. 14:33:30</p>
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<p>1 A Approximately, yes. 14:30:01 2 Q How do you know that? 14:30:03 3 A They posted those graph bars at the station 14:30:04 4 showing, you know, the arrests from, you know, the 14:30:12 5 beginning of the year to the present time then, and it 14:30:16 6 showed what it was the prior month which was about, 14:30:21 7 like, three, and then it more than doubled the following 14:30:26 8 month. We all laughed because we thought, wow, you 14:30:30 9 know, they're getting their stats. 14:30:34 10 Q Okay. And it goes on to say: "This resulted in 14:30:37 11 the violation of the civil rights of hundreds of 14:30:42 12 residents of the Compton patrol area for no other reason 14:30:45 13 but to insulate Thatcher from criticism from his 14:30:50 14 division." Is that what you -- is that true? 14:30:54 15 A Yes. It was to bring our stats up to show the 14:30:59 16 division. 14:31:03 17 Q And did you complain to anyone that, look, 14:31:05 18 you've got citizens, these are citizens and they're 14:31:08 19 being arrested, they may be disenfranchised, they may 14:31:11 20 not be able to get jobs, they're young men or young 14:31:16 21 women; did you complain to them that this is wrong? 14:31:20 22 A I mean, I complained to my peers. I knew that 14:31:22 23 after speaking with Sergeant Leos and after 14:31:26 24 Lieutenant Garrido and Lieutenant Wargo told us to do 14:31:31 25 our jobs and go out there and do our jobs, I knew that 14:31:35</p>	<p>1 Q "Claimant's first trainee was 14:33:31 2 Deputy David Battles." Is that true? 14:33:34 3 A Yes, sir. 14:33:35 4 Q "Master Field Training Officer Saul Romero 14:33:36 5 commended Claimant for doing a good job of timely 14:33:41 6 turning in his training daily observation reports." Is 14:33:44 7 that true? 14:33:48 8 A Yes. 14:33:48 9 Q "On February 13, 2020, a month after Claimant 14:33:49 10 completed his training of Battles, MFTO Romero told 14:33:53 11 Claimant to report to Battles" -- I'm sorry -- "to 14:33:59 12 report to the LASD patrol school so that Claimant could 14:34:03 13 have the first opportunity to pick his next trainee." 14:34:09 14 Is that true? 14:34:11 15 A Yes, sir. 14:34:12 16 Q "Battles was an ideal patrol candidate and had 14:34:12 17 excelled in and completed all but his final training 14:34:17 18 phase." Is that true? 14:34:22 19 A Yes, sir. 14:34:23 20 Q It goes on to say: "At this time he was failed 14:34:23 21 out of training by inked Executioner member 14:34:26 22 Deputy Edwin Barajas." Is that true? 14:34:31 23 A Yes, sir. 14:34:34 24 Q Why do you believe that Battles was retaliated 14:34:35 25 against? 14:34:44</p>
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1 A Because he came from day shift, he came from -- 14:34:44
 2 you know, he came from me as his training officer. And 14:34:47
 3 it was a known belief that day shift was lazy, that we 14:34:51
 4 didn't do anything, that we were lazy and -- well, to be 14:34:58
 5 quite honest, because I'm not an inked member. 14:35:05
 6 And I saw this coming. I even told Battles to 14:35:06
 7 make sure that he was working hard and doing everything 14:35:12
 8 he was told so he could complete his training and not 14:35:14
 9 give anybody the excuse to roll him up and fail him in 14:35:21
 10 patrol training. 14:35:24
 11 Q It goes on to say: "Thereafter, gang member 14:35:25
 12 Deputy Eugene Contreras had returned to Compton after a 14:35:36
 13 temporary assignment to the Internal Affairs Bureau. 14:35:40
 14 Upon his return, he began extremely aggressive bullying 14:35:43
 15 behavior towards other deputies with the intent of 14:35:46
 16 raising his standing within the gang. Contreras is 14:35:49
 17 presently on the list to promote to sergeant at 14:35:53
 18 Compton." 14:35:56
 19 Now, are you telling me -- you already said that 14:35:58
 20 Contreras was an inked Executioner; is that correct? 14:36:02
 21 A Well, he does not have a tattoo, but he is a 14:36:06
 22 member of the group. 14:36:09
 23 Q Well, how do you know he doesn't have a tattoo? 14:36:10
 24 A Because -- well, I mean, I had never seen one on 14:36:14
 25 him. 14:36:18

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1 duty. This assault was intended to further the 14:37:59
 2 reputation of the gang in Compton." Is that true? 14:38:03
 3 A Yes. 14:38:05
 4 Q You already told us about this assault early on 14:38:05
 5 a couple of hours ago; correct? 14:38:08
 6 A Yes, sir. 14:38:09
 7 Q It goes on to say: "On February 8, 2020, 14:38:09
 8 Banuelos texted Claimant" -- that's you -- "who was 14:38:12
 9 another fellow Field Training Officer and informed him 14:38:18
 10 of Contreras's violent conduct. Claimant was familiar 14:38:22
 11 with the aggressive behavior of Contreras, who Claimant 14:38:25
 12 knew to be inked." 14:38:30
 13 So you knew he was inked. Did you know or -- 14:38:32
 14 but you just didn't see it? 14:38:37
 15 A I couldn't hear it. Repeat that question one 14:38:41
 16 more time? 14:38:44
 17 Q I'm just reading. It says: "Claimant was 14:38:45
 18 familiar with the aggressive behavior of Contreras, who 14:38:48
 19 Claimant knew to be inked." 14:38:51
 20 A I knew he was inked. He was inked prior to the 14:38:54
 21 incident with Banuelos. 14:39:00
 22 Q Okay. "A few days later, Claimant fulfilled his 14:39:01
 23 obligation to report this violent incident anonymously 14:39:08
 24 to IAB." 14:39:11
 25 Is that your duty as an officer or as a deputy, 14:39:13

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1 Q Oh. 14:36:19
 2 A But, again, it's common knowledge within the 14:36:20
 3 station, and to my surprise, it was that he is a member 14:36:24
 4 of the group. 14:36:28
 5 Q Okay. So if he is a member of the group, what 14:36:29
 6 you're saying is in this claim is that he went all the 14:36:34
 7 way up to the IAB, the Internal Affairs Bureau; correct? 14:36:38
 8 A He went on loan to the Internal Affairs Bureau. 14:36:43
 9 And I'm not sure if it was Internal Affairs Bureau or 14:36:46
 10 Internal Criminal Affairs Bureau. And he went there on 14:36:52
 11 loan for I believe it was 12 months as a -- like part of 14:36:53
 12 the surveillance team. 14:37:01
 13 Q So this possibly inked gang member is active or 14:37:02
 14 was active in IAB, correct, even though temporarily? 14:37:09
 15 A That is correct. 14:37:13
 16 Q It goes on to say: "Contreras is presently on 14:37:14
 17 the list to promote to sergeant." Is that true? 14:37:20
 18 A He tested for sergeant. I know he placed -- I 14:37:23
 19 don't know exactly where he placed, but he was on the 14:37:29
 20 list or is on a list to promote to sergeant. 14:37:31
 21 Q Wow. It goes on to say: "In February 200, 14:37:35
 22 Contreras, now an FTO, Field Training Officer, 14:37:40
 23 threatened fellow Field Training Officer 14:37:46
 24 Deputy Thomas Banuelos with violence. This led to an 14:37:49
 25 altercation in which Contreras assaulted Banuelos on 14:37:54

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1 when you see wrong, say so? 14:39:19
 2 A Well, I think that it's every Deputy Sheriff's 14:39:21
 3 duty, to report incidents like this. Me being a field 14:39:27
 4 training officer, you know, I'm a supervisor and I have 14:39:32
 5 to report this behavior. 14:39:37
 6 Q As a matter of fact, if certain behavior had 14:39:40
 7 been reported in Minneapolis, maybe George Floyd would 14:39:47
 8 be alive; correct? I'll withdraw that question. 14:39:50
 9 Anyway. 14:39:50
 10 "A few days later, Claimant fulfilled his 14:39:54
 11 obligation to report this violent incident anonymously 14:40:02
 12 to IAB." Is that what you did? 14:40:07
 13 A Yes, sir. 14:40:10
 14 Q Then it says: "As Claimant would later learn, 14:40:10
 15 there was nothing confidential about this report as the 14:40:15
 16 Executioner gang had infiltrated IAB and would later 14:40:19
 17 obtain a recording of his voice making the anonymous 14:40:24
 18 phone call to IAB." How do you know that? 14:40:28
 19 A I believe it was on the day that I went to 14:40:31
 20 monitor my new trainee that I was going to get in 14:40:39
 21 February. I was at the Star Center in Whittier 14:40:43
 22 monitoring the trainees that were coming. That same 14:40:52
 23 day, Deputy Alcala and among other deputies from the 14:40:55
 24 station were at a class, some training class at the same 14:41:01
 25 facility. 14:41:05

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1 Deputy Alcala had told me that he was approached 14:41:10
2 by Deputy Vega, and Deputy Vega told Deputy 14:41:13
3 Alcala, "What's up with your boy Gonzalez? We know he's 14:41:17
4 the one who called IA, and we can't get to get our hands 14:41:20
5 on the voice print." 14:41:26
6 Q We can't get our hands on the what? 14:41:28
7 A "We can't wait to get our hands on the voice 14:41:28
8 print." 14:41:32
9 Q Okay. 14:41:33
10 A Deputy Alcala called me and he told me to be 14:41:34
11 careful as Deputy Alcala was the only person who knew 14:41:39
12 that I had called Internal Affairs to report this 14:41:44
13 assault. Deputy Alcala told me, "Be very careful. They 14:41:47
14 know it was you." I asked him, "How do they know," and 14:41:51
15 he said he didn't know and again repeated that they 14:41:55
16 couldn't wait to get their hands on the voice print. 14:41:57
17 That really scared me. When I heard that, it was -- you 14:42:00
18 know, it got very real for me. 14:42:03
19 Q Did you fear for your life at that point? 14:42:06
20 A Absolutely, I feared for my safety. I mean, 14:42:10
21 just right away, I just couldn't stop thinking about the 14:42:14
22 whole thing, and I just didn't know what to do. 14:42:18
23 Q Did you feel -- at that point did you feel that 14:42:22
24 this Executioners gang was capable of murder? 14:42:28
25 A Maybe not them directly, but maybe through a 14:42:33

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1 department, not the executives, you know, are that 14:44:01
2 way. Do I believe that there is one or two bad apples? 14:44:06
3 Absolutely, yes. 14:44:12
4 Q And being bad apples -- or there's actually more 14:44:12
5 than one or two bad apples at Compton; correct? 14:44:18
6 A Yes. 14:44:21
7 Q And as you said, they run the station; correct? 14:44:21
8 A Yes, sir. 14:44:24
9 Q Okay. Do you feel that there was -- there could 14:44:25
10 have been some type of corrective measure taken to 14:44:37
11 eradicate this gang at some point when the Captain found 14:44:43
12 out about how they were controlling things? 14:44:47
13 A Yes, absolutely. 14:44:49
14 Q What do you think could have been done? 14:44:51
15 A I mean, not bring Juarez back to the station, 14:44:54
16 number one. 14:44:59
17 Q What? 14:45:01
18 A Not bringing Deputy Juarez back to the 14:45:03
19 station -- 14:45:05
20 Q Oh. 14:45:05
21 A -- after he was transferred. I think that was a 14:45:06
22 bad move. I think, if anything, rather than showing 14:45:09
23 that they're correcting things, they're -- you know, 14:45:12
24 they're helping it. And I think not just the station, 14:45:18
25 not just the division, but I think the department has 14:45:24

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1 third party. I mean, that did cross my mind, you know, 14:42:38
2 these gang members that they jam up, you know, would it 14:42:42
3 be crazy to think that maybe they hire one of them to 14:42:46
4 come and do a hit on me? Absolutely, that did cross my 14:42:49
5 mind. 14:42:53
6 Q It goes on to say: "Within two days of the 14:42:53
7 anonymous call, inked members of The Executioners 14:42:59
8 already knew it was Claimant who made the call." You 14:43:02
9 just testified about that. 14:43:05
10 "While at a patrol school training, Claimant was 14:43:06
11 mortified when Deputy Alcala informed him that 14:43:09
12 'The Executioners are saying that it was you who called 14:43:12
13 IA, and they can't wait to get their hands on the voice 14:43:16
14 print of the call.'" You just testified to that; 14:43:19
15 correct? 14:43:21
16 A Yes. 14:43:21
17 Q "Claimant immediately realized that as Contreras 14:43:22
18 previously worked at IAB, that a former co-worker at IAB 14:43:25
19 had illegally warned Contreras of the complaint. This 14:43:30
20 put Claimant at severe risk of violent reprisal by the 14:43:34
21 gang so Claimant took several days off of work." 14:43:38
22 So would you say that the Sheriff's Department 14:43:46
23 is crooked in the upper levels, including IAB, based on 14:43:48
24 this incident? 14:43:56
25 A Obviously, not everyone, not the whole 14:43:59

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1 had -- it's not the first complaint coming from this 14:45:26
2 group, you know. Yeah, what needs to happen? 14:45:30
3 Q Okay. It goes on to say: "After returning to 14:45:37
4 work after several days off, Claimant was still 14:45:44
5 struggling to process all this information." So you 14:45:48
6 confided in your Operations Lieutenant, Lieutenant Ruiz; 14:45:52
7 is that correct? 14:45:58
8 A Yes, sir. 14:45:58
9 Q "That he was the one who had called IAB 14:45:59
10 regarding Contreras." Is that what you told him? 14:46:03
11 A Yes, I told him that I had been the person who 14:46:06
12 had anonymously called IA. 14:46:09
13 Q Okay. And remind me, Ruiz, he wasn't tattooed; 14:46:11
14 right? 14:46:25
15 A No, not him, no. 14:46:25
16 Q Okay. "And Claimant wanted to remain anonymous 14:46:28
17 to the extent possible. Claimant found" -- is that 14:46:34
18 true? 14:46:38
19 A Yes. 14:46:38
20 Q "Claimant found himself in a worst case 14:46:38
21 scenario, as the entire Compton station knew it was him 14:46:42
22 who had reported an inked member of The Executioners to 14:46:47
23 IAB." 14:46:49
24 Okay. Wait. So in reading this, you confided 14:46:51
25 in Lieutenant Ruiz that you were the one who called IAB. 14:46:57

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<p>1 Are you saying that Lieutenant Ruiz spilled that to the 14:47:05 2 gang; is that what you're saying? 14:47:09 3 A No, no. I notified Lieutenant Ruiz, and he 14:47:11 4 notified the captain regarding this. I believe a couple 14:47:15 5 of days later, I had a talk with the captain. 14:47:20 6 Q Captain who? 14:47:27 7 A Captain Clark, our current captain. 14:47:27 8 Q Okay. 14:47:30 9 A At the time she -- you know, she was supportive 14:47:30 10 and asked me if I wanted to talk to two investigators 14:47:37 11 that were investigating this incident. She said I 14:47:41 12 didn't have to, but I believe she gave me their phone 14:47:46 13 number and asked me if it was okay for her to give them 14:47:52 14 my phone number, and I told her it was. And I don't 14:47:56 15 think initially she gave the phone number to them. 14:48:03 16 A couple of days later, I was working, and these 14:48:06 17 two investigators came to the station and went to 14:48:11 18 dispatch and told them to have me come back to the 14:48:16 19 station from the field. The watch deputy that day was 14:48:20 20 an inked member Anthony Bautista, who didn't call me to 14:48:28 21 tell me, "Hey, there are two detectives here who want to 14:48:33 22 talk to you." He called my partner that day, 14:48:36 23 Deputy Adrian Garcia, and relayed the message through 14:48:40 24 him. 14:48:43 25 I went back to the station and met with these 14:48:45</p>	<p>Page 122</p> <p>1 BY MR. SWEENEY: 14:50:11 2 Q So now we have an inked member, as you say, 14:50:11 3 running the station, and we have inked members in 14:50:15 4 dispatch too? 14:50:18 5 A Yes. In fact, Jaime Juarez's girlfriend, she 14:50:19 6 worked in dispatch. 14:50:25 7 Q Okay. And then we have inked members in the 14:50:26 8 Internal Affairs Bureau also; correct? 14:50:32 9 A Well, there was one on loan to them. 14:50:34 10 Q Right. Were the ones who got word back to the 14:50:37 11 station that you had made a complaint; correct? 14:50:43 12 A Well, it had to have been. I called 14:50:46 13 Internal Affairs to report the incident anonymously, and 14:50:48 14 a couple of days later everybody knew at my station that 14:50:52 15 I was the one who had called. 14:50:56 16 Q And then, of course, Captain Thatcher was using 14:50:57 17 the gang to get statistics up, as you testified; 14:51:01 18 correct? 14:51:07 19 A Correct. 14:51:07 20 Q It sounds to me that every aspect of the Compton 14:51:08 21 station is controlled by this gang; am I making a 14:51:12 22 correct statement? 14:51:17 23 A For the most part, yes. 14:51:18 24 Q It goes on to say that you took a week off, and 14:51:20 25 during the week off, Deputy Alcala texted a message to 14:51:31 Page 124</p>
<p>1 two investigators, and my first complaint was why they 14:48:48 2 came to the station asking for me and making it more 14:48:52 3 obvious that I was the one who had called IA. 14:48:56 4 Q So these two investigators, it appears from what 14:48:58 5 you're saying, were handling the plan to out you as the 14:49:05 6 person who made this complaint against The Executioners? 14:49:15 7 A I don't know if that was their intent. To me, 14:49:19 8 as an investigator, it wasn't the smartest move. It 14:49:23 9 wasn't the smartest way to meet with somebody. I think 14:49:26 10 they could have gone a different route to meet with me, 14:49:30 11 but especially not meet with me at the station. 14:49:37 12 MR. ROMERO: Mr. Sweeney, may I ask one question of 14:49:41 13 the witness? 14:49:46 14 MR. SWEENEY: Sure. Who is this? 14:49:46 15 MR. ROMERO: This is Alan Romero. I'm sorry. I'm 14:49:46 16 off camera. 14:49:48 17 MR. SWEENEY: Oh, sure. 14:49:50 18 MR. ROMERO: Deputy Gonzalez, was there also 14:49:53 19 interaction between the Internal Affairs investigator 14:49:56 20 with an inked member of the gang in dispatch where the 14:49:56 21 inked member of the gang was the one who relayed the 14:49:59 22 message that investigators were there to see you? 14:50:01 23 THE WITNESS: Yeah. That's -- yes, yes. 14:50:04 24 MR. ROMERO: Who was that inked member at dispatch? 14:50:06 25 THE WITNESS: It was Anthony Bautista. 14:50:09</p>	<p>Page 123</p> <p>1 you and a photo of graffiti in a very visible in the 14:51:36 2 station which read, "Art is a rat"; is that true? 14:51:41 3 A Yes, sir. 14:51:44 4 Q And where was that? 14:51:45 5 A It was on the keypad of the gate to get in at 14:51:48 6 the station. 14:51:51 7 Q And if you drove there, and everybody drove 14:51:51 8 there, you had to see that "Art is a rat" to get into 14:51:55 9 the station; correct? 14:51:59 10 A Including supervisors, yes. 14:52:00 11 Q Okay. 14:52:02 12 MR. ALTURA: Where is that, Mr. Sweeney? I lost it 14:52:07 13 there. What page are you on? 14:52:10 14 MR. SWEENEY: I'm on the second paragraph, Page 5 of 14:52:11 15 10, where you see in all caps, "Art is a rat." 14:52:16 16 MR. ALTURA: Thank you. 14:52:21 17 BY MR. SWEENEY: 14:52:24 18 Q And you said: "This had the practical effect of 14:52:24 19 calling the integrity of the entire IAB and anonymous 14:52:28 20 reporting program into question"; is that correct? 14:52:33 21 A Yes. 14:52:35 22 Q So do you feel that because you were outed, that 14:52:36 23 it is a deterrent to reporting any nefarious or bad 14:52:44 24 activities of this gang? 14:52:52 25 A Well, who do I go to? 14:52:53</p>

<p>1 Q Yup, yup. Okay. Okay. I'm going to skip down. 14:52:57 2 I'm going to skip over your statements to investigators 14:53:26 3 and go down to the last paragraph on Page 5. 14:53:30 4 "In late February 2020, after returning from 14:53:36 5 this week off from work, Claimant was approached by 14:53:39 6 Scheduling Sergeant Frank Barragan." Is that true? 14:53:42 7 A Yes. 14:53:45 8 Q And you were taken upstairs to the conference 14:53:46 9 room; true? 14:53:50 10 A Correct. 14:53:50 11 Q "Barragan reprimanded Claimant for taking 14:53:51 12 intermittent CFRA/FMLA three to five days per month to 14:53:55 13 care for his ill daughter, Caitlynne." Is that true? 14:53:59 14 A That is correct. 14:54:02 15 Q "Barragan informed Claimant that he was being 14:54:03 16 demoted from his FTO position." Did that happen? 14:54:06 17 A No, not demoted, just not giving me any more 14:54:09 18 trainees which in in turn meant no more 5 percent raised 14:54:12 19 pay. 14:54:16 20 Q So did you feel that your going against the 14:54:16 21 wishes and getting on the bad side of The Executioners 14:54:24 22 cost you that 5 percent raise? 14:54:28 23 A Absolutely, yes. 14:54:35 24 Q And did you feel that you had to choose between 14:54:37 25 The Executioners desires and your daughter, Caitlynne? 14:54:42 </p>	<p>1 Q So it sounds like it paid to be an Executioner; 14:56:54 2 is that correct? 14:56:59 3 A Yes, sir. 14:56:59 4 Q It literally paid. You got more money as an 14:57:00 5 Executioner; correct? 14:57:03 6 A Yes. 14:57:04 7 Q And if you weren't an Executioner, like you are 14:57:04 8 not, you lost your 5 percent pay raise; correct? 14:57:10 9 A Yes. 14:57:15 10 Q So am I correct in saying that there's money in 14:57:15 11 the bank to be an Executioner? 14:57:19 12 A Yes, I believe that if I would have been a 14:57:21 13 member of that group, I would still be a training 14:57:25 14 officer at the station. 14:57:28 15 Q It goes on to say that "Claimant believed that 14:57:29 16 Juarez exercised the power of the gang to control who 14:57:36 17 would be eligible for an FTO position and to retaliate 14:57:43 18 against Claimant as a result of his IAB complaint 14:57:44 19 against the gang." You wrote that or you said that? 14:57:47 20 A Yes. 14:57:51 21 Q And then in the next paragraph, you say: "As of 14:57:52 22 now, no other deputy at Compton will be a partner with 14:58:02 23 Claimant due to his being targeted for retaliation by 14:58:05 24 The Executioners." Did you say that? 14:58:10 25 A Yes. There was one deputy that did partner up 14:58:12 </p>
<p>Page 126</p> <p>1 A Say that again? 14:54:46 2 Q Did you feel at some point you had to choose 14:54:49 3 between the desires of The Executioners and doing what 14:54:52 4 they say and becoming a member versus caring for your 14:54:57 5 daughter; did you feel that way? 14:55:02 6 A Well, yes. I mean, I was taking intermittent 14:55:03 7 days of FMLA, and they used this excuse to not give me 14:55:07 8 trainees anymore, but it was very obvious with the 14:55:13 9 timing that that wasn't the case. The Executioners 14:55:19 10 didn't want me to be a TO anymore, and instead they 14:55:23 11 wanted their prospects to become temporary TO's, as they 14:55:28 12 call them, to be training officers and get rid of me. 14:55:34 13 Q Getting down to it -- and I'm trying to 14:55:39 14 eliminate some of the things in the claim that may be 14:55:54 15 relevant to your employment claim and not necessarily 14:55:59 16 this, so forgive me and bear with me one second. Can 14:56:03 17 you do that? 14:56:09 18 A Yes. No problem, sir. 14:56:09 19 Q It goes on in the second paragraph of Page 6 at 14:56:25 20 the end, it says: "On or about this time, 14:56:29 21 Sergeant Barragan authorized the hiring of temporary 14:56:40 22 FTOs and the temporary FTO position was offered to 14:56:44 23 Juarez and other members or prospects of 14:56:50 24 The Executioners." Is that correct? 14:56:53 25 A Yes, sir. 14:56:54 </p>	<p>Page 128</p> <p>1 with me. 14:58:14 2 Q Okay. And why do you believe that other -- if 14:58:15 3 you know. Don't speculate. If you know, why -- strike 14:58:21 4 that. Let me ask this question. 14:58:27 5 Has anybody told you at the Compton station, 14:58:29 6 "Hey, I don't want to be a partner with you because you 14:58:32 7 are being targeted by The Executioners"? 14:58:37 8 A Yes. 14:58:39 9 Q Who told you that? 14:58:40 10 A It was Deputy Alcala. 14:58:42 11 Q Deputy who? 14:58:48 12 A Alcala. 14:58:49 13 Q Alcala. Okay. A-l-c-a-l-a? 14:58:50 14 A Correct. And it was Deputy Garcia. 14:58:54 15 Q Did they tell you they were frightened by this 14:58:59 16 gang? 14:59:03 17 A They told me that they just basically wanted to 14:59:03 18 stay away from jumping in with me because of what was 14:59:06 19 going on. 14:59:09 20 Q It goes on to say: "Further, the inked deputy 14:59:10 21 in dispatch, Bautista, began a pattern and practice with 14:59:18 22 slamming Claimant with excessive calls compared to other 14:59:22 23 deputies on the same shift." What does "slamming" mean? 14:59:26 24 A Slamming is they give you -- you know, they're 14:59:27 25 not spreading the calls evenly with the other units. 14:59:30 </p>

1 A That was an allegation, yes. It was a 2 station-level complaint. 17:00:29	1 the tattoo of the group was The Executioners. 17:03:18
3 Q And were you suspended -- 17:00:34	2 Q Well, you learned that from the plaintiff 17:03:24
4 A No. 17:00:36	3 lawyer, John Sweeney; isn't that right? 17:03:28
5 Q -- as a result of that complaint? 17:00:37	4 A I beg your pardon? 17:03:31
6 A No, sir. 17:00:40	5 Q I said you learned about that name from the 17:03:33
7 Q You had no discipline whatsoever? 17:00:41	6 plaintiff lawyer in the case, John Sweeney? 17:03:36
8 A No, sir. 17:00:43	7 A No. I learned about The Executioners name at 17:03:38
9 Q Now -- 17:00:43	8 the station among deputies. 17:03:41
10 THE VIDEOGRAPHER: I'm sorry. This is the 17:01:01	9 Q What deputy did you know that told you about 17:03:42
11 videographer. So we have the witness and his attorney 17:01:03	10 The Executioners tattoo? 17:03:47
12 in the screen. I want to make sure that you're okay 17:01:05	11 A It was in a group, you know, like a circle of 17:03:50
13 with that because normally it's just the witness. 17:01:08	12 deputies near a patrol car, and I don't remember which 17:03:53
14 MR. IVIE: I think that's what it's supposed to be is 17:01:12	13 one is the one who said, "Hey, you know, they're name is 17:03:58
15 the witness. 17:01:15	14 Executioner. Can you believe that?" 17:04:01
16 THE VIDEOGRAPHER: Right. And if we can just make 17:01:21	15 Q How many deputies -- how many deputies were 17:04:03
17 sure that the witness stays in the center of the screen, 17:01:23	16 around that circle? 17:04:05
18 that would be perfect. Thank you. 17:01:25	17 A I think maybe three or four. 17:04:06
19 BY MR. IVIE: 17:01:27	18 Q And who were they? 17:04:09
20 Q Is there another popular tattoo at Compton that 17:01:40	19 A I don't remember, sir. 17:04:11
21 features a character holding an axe? 17:01:46	20 Q And how did they know that the name was 17:04:12
22 A There was word that there was one, and they used 17:01:50	21 The Executioners? 17:04:18
23 to call it, I guess, the old ink or something like 17:01:55	22 A Well, I asked, "Confirmed?" And they said, "Oh, 17:04:19
24 that. 17:01:58	23 yes, confirmed." 17:04:23
25 Q Have you seen any deputies with that tattoo? 17:01:58	24 Q You asked what? What did you ask? 17:04:25
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1 A No, sir. 17:02:04	1 got that information. 17:04:30
2 Q And you say you know all the deputies that work 17:02:04	2 Q But they gave you the information? 17:04:31
3 at Compton? 17:02:12	3 A Yes, sir. 17:04:33
4 A I know them, yes. 17:02:13	4 Q You don't know whether or not they read it in a 17:04:34
5 Q And how many deputies work at Compton? 17:02:15	5 newspaper? 17:04:37
6 A It's hard to tell. That's a good question. I 17:02:18	6 A I do not know that, sir, no. 17:04:38
7 wouldn't -- 17:02:23	7 Q You understand, you realize that Mr. Sweeney 17:04:40
8 Q Is there maybe about a hundred deputies that 17:02:24	8 gave a press conference after that deposition, and then 17:04:43
9 work at Compton? 17:02:27	9 Mr. Sweeney used the name Executioners? 17:04:49
10 A Around there, yes. 17:02:29	10 A I didn't. 17:04:53
11 Q And you say there are about 20 of them with a 17:02:30	11 MR. SWEENEY: No, I didn't, Mr. Ivie. 17:04:55
12 tattoo? 17:02:33	12 BY MR. IVIE: 17:04:58
13 A With The Executioners tattoo, about 20. I would 17:02:33	13 Q All right. So -- 17:04:58
14 calculate maybe 15, 20. 17:02:37	14 MR. SWEENEY: You're incorrect with that, Mr. Ivie. 17:05:01
15 MR. SWEENEY: You're referring to The Executioners 17:02:43	15 You're making that up. 17:05:03
16 tattoo and not the one with the axe; correct? 17:02:45	16 MR. IVIE: No, I'm not. You've said that several 17:05:05
17 MR. IVIE: Right. I'll call that the subject tattoo. 17:02:48	17 times. 17:05:08
18 BY MR. IVIE: 17:02:48	18 MR. SWEENEY: Well, no. That press conference where 17:05:09
19 Q Speaking of the word "Executioner", you say you 17:02:52	19 I announced to the world, there was a clip, and I did 17:05:15
20 heard -- you first heard of that name about six months 17:02:55	20 not use the word "Executioners" because I didn't know. 17:05:18
21 ago? 17:02:57	21 But, anyway, continue on. 17:05:22
22 A No. I heard The Executioners name, it was 17:02:58	22 BY MR. IVIE: 17:05:23
23 really after the incident with the deposition of 17:03:04	23 Q So let me ask you this. You were with three 17:05:24
24 Deputy Aldama where they showed his tattoo in the media. 17:03:11	24 deputies, and somebody said the name was Executioners, 17:05:26
25 After that, at the station I learned that the name of 17:03:15	25 and you don't know where that came from, you don't know 17:05:29
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1 how they learned?	17:05:33	1 A Yes, sir.	17:07:40
2 A I don't know how they learned about it or if	17:05:34	2 Q Okay. Now, I want to explore what you mean by	17:07:41
3 they had known the whole time and they were just now	17:05:37	3 "common knowledge". It was -- first off, can you	17:07:45
4 sharing it.	17:05:40	4 identify a deputy that told you anything about the group	17:07:50
5 Q But you have no idea; correct?	17:05:41	5 that you call The Executioners?	17:07:58
6 MR. ROMERO: Asked and answered.	17:05:43	6 A I don't remember who the deputy was that was	17:08:00
7 Go ahead.	17:05:44	7 there that day that told me.	17:08:03
8 THE WITNESS: I had no idea where they received the	17:05:45	8 Q I said did you talk to any deputy at any time	17:08:05
9 information from.	17:05:49	9 where you discussed this group?	17:08:12
10 BY MR. IVIE:	17:05:49	10 A There's been a dozen deputies that we've	17:08:15
11 Q Okay. But you've been at that station for five	17:05:50	11 discussed this group with.	17:08:19
12 and a half years. Let me see.	17:05:55	12 Q Okay. Tell me the deputies that you've	17:08:20
13 Approximately what year was it that you had this	17:05:57	13 discussed this group with.	17:08:22
14 conversation with these three deputies?	17:06:00	14 A Oh, my God. Let's see. Deputy Mike Miller,	17:08:23
15 A It was after the Aldama deposition, whenever the	17:06:02	15 Deputy Carrara, Deputy Garcia, Deputy Guzman,	17:08:31
16 year that was. It was 2018. I can't remember	17:06:07	16 Deputy Perez. That's off the top of my head.	17:08:38
17 correctly.	17:06:12	17 Q Miller, Garcia, Guzman, Perez, and who else?	17:08:49
18 Q And what year -- you're about right. And what	17:06:12	18 A Deputy Carrara, Deputy Miller, I think I said,	17:08:52
19 year did you come to the station?	17:06:16	19 Deputy Alcala.	17:09:02
20 A 2015.	17:06:17	20 Q Okay. Anybody else?	17:09:03
21 Q So you had been there three years?	17:06:18	21 A Off the top of my head, that's all I can	17:09:10
22 A Yes, sir.	17:06:22	22 remember right now. I'm sure there's more though.	17:09:24
23 Q And you never heard of that name; correct?	17:06:23	23 Q So none of these deputies had the tattoo;	17:09:27
24 A Ever.	17:06:25	24 correct?	17:09:29
25 Q All right. And during the three years that you	17:06:25	25 A No, not that I know of, no.	17:09:30
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1 were at that station, had you seen anyone with the	17:06:28	1 Q And none of these deputies are in the group;	17:09:33
2 tattoo?	17:06:31	2 correct?	17:09:35
3 A Oh, yes.	17:06:32	3 A Correct.	17:09:35
4 Q Okay. Who was the first person that you saw	17:06:32	4 Q And when did you have this conversations with	17:09:36
5 with that tattoo?	17:06:40	5 these deputies?	17:09:47
6 A Oh, I can't remember who the first person was,	17:06:41	6 A Various times throughout, you know, the last	17:09:48
7 sir.	17:06:44	7 year and a half, two years.	17:09:50
8 Q Did you ever speak to any person who had the	17:06:44	8 Q Only for the last two years you've had this	17:09:52
9 tattoo and ask them to explain it to you?	17:06:48	9 conversation with these deputies about this alleged	17:09:56
10 A No, sir, I did not do that.	17:06:50	10 group?	17:09:59
11 Q And did you ever speak to anyone that had the	17:06:53	11 A Correct, sir.	17:09:59
12 tattoo and ask them, "Hey, are you a member of a group?"	17:06:58	12 Q And that's since there's been coverage about the	17:10:01
13 A No, I never did that.	17:07:02	13 group in the media; correct?	17:10:07
14 Q And you've never done that to this day; correct?	17:07:03	14 A Yes, yes.	17:10:10
15 A No.	17:07:09	15 Q You've read some of those stories, haven't you?	17:10:12
16 Q And you've never spoken to anyone with a tattoo	17:07:10	16 A No. I just saw the one -- the one on the news	17:10:15
17 that told you that they were in a group named	17:07:15	17 clip in the news regarding the Aldama incident.	17:10:19
18 The Executioners?	17:07:18	18 Q Okay. So you read that news article?	17:10:23
19 A No, sir.	17:07:19	19 A I watched it on TV, and I think I also read it	17:10:27
20 Q Now, you said that it was something like common	17:07:20	20 somewhere, yes.	17:10:31
21 knowledge -- that's what I believe your testimony was --	17:07:27	21 Q You read it in the Times; correct?	17:10:31
22 that they were The Executioners?	17:07:33	22 A I don't remember what source it was, but I read	17:10:33
23 A Yes.	17:07:35	23 it somewhere.	17:10:36
24 Q The people with the tattoo were Executioners,	17:07:35	24 Q All right. And the paper talked about	17:10:37
25 you said it was common knowledge?	17:07:38	25 The Executioners and this tattoo; correct?	17:10:40
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<p>1 A I don't remember seeing Executioners on the 17:10:44 2 paper. 17:10:49 3 Q I see. Okay. So -- 17:10:49 4 MR. SWEENEY: I'm going to object. Vague as to what 17:10:52 5 article. There have been many articles. 17:10:55 6 MR. IVIE: Yes, there has been, very many, a bunch of 17:10:57 7 them. 17:11:00 8 BY MR. IVIE: 17:11:00 9 Q And you've seen several of them, haven't you, 17:11:01 10 Deputy? 17:11:03 11 A When, sir? Because now I've seen articles, yes. 17:11:03 12 Q And you've seen them the last year and a half to 17:11:07 13 two years? 17:11:11 14 A I'm sorry. Prior to -- well, shoot, prior to my 17:11:12 15 claim being submitted, I had seen them, but I haven't 17:11:16 16 seen anything with "Executioners" in the media until 17:11:20 17 after my claim was submitted. 17:11:23 18 Q I see. Well, I will have to show you some of 17:11:25 19 these articles and maybe that will refresh your 17:11:33 20 recollection if I ever get that opportunity. 17:11:37 21 Now, did any of these deputies that you just 17:11:41 22 mentioned, have they ever been a member of 17:11:57 23 The Executioners, as you call them -- 17:12:02 24 MR. ROMERO: Asked and answered. 17:12:06 25 /// 17:12:07</p>	<p>1 partners because a lot of us get drafted from day shift 17:13:17 2 to work p.m.'s because, you know, there's an ink party 17:13:21 3 going on. 17:13:24 4 Q Okay. Now, who's told you that there was an ink 17:13:25 5 party going on? 17:13:28 6 A I can't remember. 17:13:29 7 Q So you can't remember who told you, and you 17:13:32 8 can't remember when you were told; is that what your 17:13:37 9 testimony is? 17:13:40 10 MR. ROMERO: Argumentative; badgering; harassing. 17:13:41 11 THE WITNESS: That's what I'm saying. 17:13:44 12 BY MR. IVIE: 17:13:47 13 Q Okay. Now, you also say that in order to get a 17:13:47 14 tattoo, that a deputy has to have been involved in some 17:14:06 15 use of force? 17:14:13 16 A When did I say that, Counsel? 17:14:14 17 Q I'm asking, is that your testimony? 17:14:16 18 A Say that one more time? 17:14:19 19 Q Let me be clear. Is that your testimony? 17:14:21 20 A Can you repeat the question? 17:14:24 21 Q Is it your testimony that in order to get a 17:14:26 22 tattoo, a deputy has to have been involved in a use of 17:14:29 23 force? 17:14:33 24 A No, that is not my testimony. 17:14:34 25 Q So how does a deputy get the tattoo? 17:14:36</p>
<p style="text-align: right;">Page 194</p> <p>1 BY MR. IVIE: 17:12:07 2 Q -- at any time? 17:12:08 3 MR. SWEENEY: Calls for speculation. 17:12:10 4 THE WITNESS: I don't -- no, not to my knowledge, 17:12:11 5 they're not. 17:12:16 6 BY MR. IVIE: 17:12:16 7 Q All right. Now, you said that there are ink 17:12:17 8 parties? 17:12:27 9 A That's what they call them. 17:12:27 10 Q Now, again, you said that this was common 17:12:28 11 knowledge? 17:12:30 12 A Yes, sir. 17:12:32 13 Q Okay. It is common knowledge, you say, because 17:12:32 14 you talked to some deputies about the ink parties; is 17:12:39 15 that right? 17:12:43 16 A Yes, sir. 17:12:43 17 Q When did you talk to a deputy about an ink 17:12:43 18 party? 17:12:47 19 A After they happened. I can't remember off the 17:12:48 20 top of my head, but it's very easy to find those dates 17:12:52 21 if you look at in-services where you have a large number 17:12:57 22 of these deputies taking off on a Saturday on p.m.'s. 17:13:02 23 Q Okay. So, what, this is something, a 17:13:06 24 conversation that you've had within the last two years? 17:13:13 25 A Well, yes, and complaining about it with my 17:13:15</p>	<p style="text-align: right;">Page 196</p> <p>1 A Well, based on what I've seen, it's after, you 17:14:42 2 know, being involved in a deputy-involved shooting. 17:14:50 3 I've seen Orrego and Aldama or learned common knowledge 17:14:55 4 that they got inked soon after that shooting, that 17:15:00 5 Barajas and Ingersoll also got inked soon after their 17:15:06 6 shooting. And that's, you know, in the five years that 17:15:10 7 I've been at Compton -- well, four years when the 17:15:13 8 Barajas incident happened then. 17:15:22 9 A lot of the deputies who get ink have been 17:15:24 10 involved in a lot of, you know, force incidents, more 17:15:27 11 than the average, you know, at the station. So, you 17:15:31 12 know, that's what I see and that's -- you know, I don't 17:15:36 13 know what requirements they have because I've never been 17:15:40 14 asked to be a member of that group so I don't know what 17:15:43 15 the requirements are. I just -- you know, based on what 17:15:46 16 I've observed and see, it's that -- you know, I'd say 17:15:52 17 that, yeah -- 17:15:55 18 Q So you just kind of surmised that based on your 17:15:57 19 perceived observations; is that right? 17:16:03 20 A Based on my perceived observations, correct. 17:16:04 21 Q Okay. So Deputy Benzar, has he had a shooting? 17:16:07 22 A I don't remember. I don't know. 17:16:13 23 Q Has Deputy Benzar had any force, use-of-force 17:16:15 24 complaints? 17:16:20 25 MR. ROMERO: Calls for speculation. 17:16:23</p>

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1 THE WITNESS: I wouldn't know. 17:16:25	1 A Correct. 17:18:43
2 BY MR. IVIE: 17:16:26	2 Q And as far as you know, anybody that told you 17:18:43
3 Q All right. And you've never talked to him about 17:16:27	3 that didn't speak to him about any of that? 17:18:47
4 that; right? 17:16:30	4 A Maybe they did. I wouldn't know. 17:18:51
5 A No. Him and I don't speak. 17:16:30	5 Q All right. But you don't know the source of any 17:18:53
6 Q And you're not aware of him being involved in 17:16:33	6 of this common knowledge that you are speaking about, do 17:18:56
7 any shootings; is that right? 17:16:36	7 you? 17:19:00
8 A No, not that I remember, no. 17:16:37	8 A Correct. 17:19:00
9 Q And he has a tattoo, doesn't he? 17:16:41	9 Q Okay. By the way, you said -- have you ever 17:19:01
10 A Yes. 17:16:44	10 been a gang member? 17:19:11
11 Q Okay. And you don't know if he got that tattoo 17:16:45	11 A No, sir. 17:19:13
12 because he was invited to get a tattoo, do you? 17:16:52	12 Q And have you ever gotten any training in gangs? 17:19:13
13 A As far as I know, he was invited to get the 17:16:55	13 A You know, the training that they give us in, you 17:19:19
14 tattoo. 17:16:57	14 know, the academy, we learned a little bit from, you 17:19:23
15 Q How do you know that? 17:16:57	15 know, when I came to the station, and then whatever we 17:19:29
16 A Common knowledge. 17:16:58	16 experienced at the station regarding gangs. 17:19:32
17 Q Okay. Common knowledge. Let's talk about 17:16:59	17 Q Okay. But you're not a gang expert, are you? 17:19:34
18 that. When you say "common knowledge", do you mean 17:17:02	18 A No, sir. 17:19:37
19 that's something that somebody told you? 17:17:05	19 Q You've heard of the term "gang expert"; right? 17:19:38
20 A It's something that the line of deputies know, 17:17:07	20 A Yes, sir. 17:19:41
21 that the deputies working the line know. That's common 17:17:12	21 Q And those are people that have intimate 17:19:42
22 knowledge. 17:17:15	22 knowledge about the gangs. They study the gangs. 17:19:49
23 Q How do you know they know? Did anyone ever tell 17:17:15	23 A Yes. 17:19:52
24 you that Benzor got a tattoo because he was invited to 17:17:19	24 Q Or they've infiltrated the gangs and things of 17:19:52
25 get a tattoo? 17:17:25	25 that nature. 17:19:56
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1 A It's been more like, "Oh, Benzor got inked this 17:17:26	1 A No. 17:19:57
2 weekend" or "Benzor just got inked" type of thing. 17:17:30	2 Q You've not done any of that; correct? 17:19:57
3 Q Okay. Who said that? 17:17:34	3 A No, sir. 17:19:58
4 A Again, it's -- I don't remember. It's word at 17:17:36	4 Q Now, in your claim, you said there were 20 17:19:59
5 the station. 17:17:46	5 prospects; do you recall that? 17:20:06
6 Q So you don't remember who said it. And when was 17:17:47	6 A Yes. 17:20:14
7 that said? 17:17:53	7 Q And what are their names? 17:20:15
8 A Soon after he got inked. 17:17:53	8 A Deputy Vega, Deputy Hernandez, Deputy Aiya, 17:20:17
9 Q And when did he get inked? 17:18:00	9 (spelled phonetically) Deputy Avalos, Deputy Self, 17:20:41
10 A Oh, I don't remember. 17:18:02	10 Deputy Harris. 17:20:52
11 Q Well, if you don't remember when he got inked, 17:18:03	11 Q Who? 17:20:52
12 how can you know it was soon after he got inked that 17:18:08	12 A Deputy Self, Deputy Harris. 17:20:53
13 somebody said that? 17:18:11	13 Q I'm sorry. Deputy -- 17:20:57
14 A Because the station learned about it right after 17:18:12	14 A Harris. 17:20:58
15 everybody -- the people who get inked get inked. 17:18:15	15 Q Harris. Okay. 17:21:00
16 Q So you don't remember when you heard that, and 17:18:22	16 A Deputy Vasquez, Deputy Baray. Well, these are 17:21:01
17 you don't remember when he got it? 17:18:24	17 the prospects I -- again, it's common knowledge. I 17:21:11
18 MR. ROMERO: Asked and answered. 17:18:30	18 heard he just got inked. 17:21:15
19 THE WITNESS: Correct. 17:18:33	19 Q And Deputy Baray, was he involved in a shooting? 17:21:27
20 BY MR. IVIE: 17:18:34	20 A No. 17:21:31
21 Q Is that right? 17:18:35	21 Q When did he get inked? 17:21:31
22 Okay. All right. But you do know he didn't 17:18:36	22 A Supposedly not too long ago. Recent. Like 17:21:37
23 tell you -- 17:18:38	23 weeks. 17:21:41
24 A Correct. 17:18:39	24 Q Did you ever see it? 17:21:41
25 Q -- or something along those lines? 17:18:39	25 A No. 17:21:47
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1 Q Now, you claim that Captain Thatcher knew about 17:28:15 2 the existence of this group. Is it true that your only 17:28:38 3 basis for making this statement is that he sent out an 17:28:44 4 e-mail concerning this tattoo? 17:28:49	1 A The last four of 2019. 17:31:57 2 Q Okay. And what was this incident? 17:32:00 3 A Her and her partner are trying to cuff this 17:32:02 4 individual, and they get into a fight. The individual 17:32:14 5 is resisting, and Deputy Dominguez is the one trying to 17:32:20 6 control the suspect while Deputy Vargas is just standing 17:32:26 7 around looking at her radio, going back into the car and 17:32:30 8 then comes out and doesn't do anything to help out her 17:32:37 9 partner, and her partner is now on the floor fighting 17:32:40 10 this suspect. 17:32:44
5 A No, it wasn't just the e-mail. It was, you 17:28:54 6 know, a number of things. It was, you know, the whole 17:28:57 7 thing with the stats and how -- 17:29:03	11 Q Okay. And you were present? 17:32:46 12 A Oh, there's a video. I saw a video of it. 17:32:49 13 Q Okay. You saw a video of it? 17:32:52 14 A Yes, sir. 17:32:55
8 Q It was the what? 17:29:05 9 A The stats. The arrest stats. 17:29:07	15 Q Okay. And where did you see the video? 17:32:55 16 A I can't remember where I saw it. It was on some 17:33:00 17 type of social media. Somebody texted it to me. It was 17:33:05 18 going around the station. The whole department knew 17:33:08 19 about this. The whole department was commenting on as 17:33:11 20 to why -- and not just our department, other agencies, 17:33:14 21 why this deputy was still working for our department and 17:33:17 22 saying that she had no business being a Deputy Sheriff. 17:33:23 23 Q I see. And you still have the video? 17:33:27 24 A No, I don't think so. 17:33:29 25 Q You don't have the video? 17:33:31
10 Q Okay. 17:29:10 11 A Combined with, you know, the Jaime Juarez 17:29:12 12 incident with Acting Captain Waldie and then bringing 17:29:21 13 him back, and then Thatcher knowing about the last 17:29:25 14 incident with Juarez's girlfriend where she did not 17:29:34 15 assist her partner when her partner was fighting for his 17:29:38 16 life. 17:29:42	Page 206
17 And history shows that deputies who have been 17:29:43 18 involved in fatalities get fired from the department. 17:29:47 19 It wasn't the case with her because, you know, it's our 17:29:52 20 belief that that was Thatcher's last favor to Juarez 17:29:59 21 before he retired. 17:30:03	Page 208
22 Q Okay. And Juarez's girlfriend's name is -- I'm 17:30:05 23 sorry. The deputy's name is -- you said she was his 17:30:11 24 girlfriend? 17:30:14	
25 A Is still. I think they're still together. 17:30:15	
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1 Q And what's her name? 17:30:18 2 A Iliana Vargas. 17:30:20 3 Q Okay. So it was the stats, you say, it was the 17:30:22 4 e-mail, it was bringing Juarez back, and then it was the 17:30:29 5 treatment of Deputy Iliana Vargas. Anything else? 17:30:43 6 A Not that I can remember right now. 17:30:48 7 Q All right. So based on these things, you've 17:30:51 8 made this accusation that Thatcher knew, 17:30:54 9 Captain Thatcher knew about the existence of this group? 17:30:59 10 MR. SWEENEY: Objection. It's argumentative. 17:31:04 11 THE WITNESS: That's my belief. 17:31:08 12 BY MR. IVIE: 17:31:09 13 Q Okay. So if we can take these in reverse order, 17:31:12 14 let me first ask you about Vargas. You said she 17:31:18 15 demonstrated cowardice and didn't assist her partner. 17:31:22 16 When was that? 17:31:27 17 A It was late last year. 17:31:27 18 Q Okay. Late last year in what, December 2019? 17:31:33 19 A I don't remember. I don't remember the exact 17:31:39 20 date. I mean, I could, you know, look it up. I mean, I 17:31:40 21 could find it. 17:31:45	1 A No. 17:33:36 2 Q Are you sure you don't have it? 17:33:36 3 A As far as I know, I don't have it. It was one 17:33:38 4 of those, you know, click -- you know, like those videos 17:33:42 5 on -- it was like a link to a social media so I don't 17:33:47 6 know if it's still there or not. 17:33:54 7 Q But you didn't keep a copy of it? 17:33:56 8 A No. 17:34:00 9 Q Okay. And so who was her partner? 17:34:00 10 A Deputy Dominguez. 17:34:07 11 Q Did you ever speak to Dominguez about it? 17:34:08 12 A No. No. 17:34:12 13 Q And were administrative charges brought against 17:34:17 14 Deputy Vargas? 17:34:30 15 A The word was that she had -- she was just going 17:34:31 16 to be sent to training. 17:34:36 17 Q Now, you've known Deputy Vargas for quite some 17:34:37 18 time; correct? 17:34:49 19 A Yes, sir. 17:34:49 20 Q You went through training school with her, 17:34:50 21 didn't you? 17:34:52 22 A We were at the same academy. 17:34:53 23 Q Yeah, that's right. 17:34:55 24 A Yes, sir. 17:34:56 25 Q All right. And you also filed a -- and for a 17:34:57
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1 while, she was your partner; right? 17:35:01	1 Q You never talked to him about the incident? 17:38:02
2 A We would jump in from time to time. 17:35:02	2 A No. 17:38:04
3 Q And this is -- and you both started at Compton 17:35:07	3 Q You had never written him any memos about the 17:38:05
4 around the same time; is that right? 17:35:11	4 incident? 17:38:08
5 A No. I started first. I got off training, and 17:35:12	5 A About Vargas and the force incident? 17:38:08
6 then she came -- I want to say she came, like, maybe 17:35:16	6 Q Yes. 17:38:11
7 eight months after I did. Maybe late 2015, early 2016 17:35:19	7 A No, but common practice is any force incident 17:38:12
8 maybe. 17:35:24	8 goes up to division. 17:38:18
9 Q Okay. And then in, I guess, January of 2018, 17:35:24	9 Q And he's never told you that he knew about the 17:38:20
10 you and Vargas had a little verbal altercation; is that 17:35:34	10 incident? 17:38:23
11 right? 17:35:38	11 A No, sir. 17:38:23
12 A Yes, we did. 17:35:38	12 Q Okay. And has anyone ever told you that they 17:38:24
13 Q And she accused you of hitting her with your 17:35:41	13 discussed the incident with Commander Thatcher? 17:38:32
14 patrol car; is that right? 17:35:48	14 A No, sir. 17:38:36
15 A Well, I didn't know she had accused me of that. 17:35:50	15 Q Now, you've talked a lot about the stats, about 17:38:36
16 I notified my watch commander that day that while having 17:35:53	16 arrest stats. What are arrest stats? 17:38:50
17 a suspect in my back seat, she didn't want to move away 17:35:59	17 A Arrest stats is the arrests that a station gets. 17:38:53
18 from my vehicle so I could park, and she went off on me 17:36:03	18 Q And does it keep a record of the number of 17:39:01
19 saying -- you know, using profanity and all sorts of 17:36:06	19 arrests that particular deputies make? 17:39:06
20 other things. 17:36:10	20 A Yes, sir. 17:39:08
21 Q All right. And you reported her for that? 17:36:11	21 Q And you said that the stats for Compton were 17:39:09
22 A Yes. You know, work violence or violence in the 17:36:15	22 lower than some other stations? 17:39:15
23 workplace. 17:36:19	23 A That was the complaint. 17:39:17
24 Q Okay. And you believe Captain Thatcher knew 17:36:20	24 Q Okay. And you said there was a quota of arrests 17:39:19
25 about this incident? 17:36:38	25 that was set? 17:39:24
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1 A He found out. They reported it to him. 17:36:39	1 A I call it a quota, yes. 17:39:26
2 Q Who reported it to him? 17:36:42	2 Q What was the quota? 17:39:28
3 A In the station, we assumed Lieutenant Walker, 17:36:45	3 A Well, to raise the number we had. We were at a 17:39:30
4 who was the lieutenant who took the complaint. 17:36:49	4 number, and they didn't like that number. They wanted 17:39:33
5 Q He took a complaint from whom? 17:36:51	5 more. That, to me, is a quota. 17:39:36
6 A From me. 17:36:53	6 Q So telling deputies to increase their 17:39:38
7 Q About -- no, no, no. I'm not talking about this 17:36:54	7 productivity is a quota in your mind? 17:39:48
8 incident. Not the incident between you and Vargas. I'm 17:36:58	8 A It isn't productivity. 17:39:51
9 sorry. I jumped around, and I shouldn't have. Excuse 17:37:02	9 Q Well, these arrests is what deputies do; right? 17:39:53
10 me. 17:37:05	10 A They said stats. 17:39:56
11 I was asking you about the incident involving 17:37:06	11 Q Pardon me? 17:39:59
12 Dominguez and Vargas. Do you believe that 17:37:10	12 A They said stats. 17:40:00
13 Captain Thatcher knew about this incident? 17:37:14	13 Q All right. To increase stats is to increase 17:40:02
14 A Commander Thatcher knew about it, yes. He's 17:37:18	14 arrests; correct? 17:40:05
15 our, you know, commander. 17:37:22	15 MR. ROMERO: I would object to the extent that we're 17:40:06
16 Q So how do you know that he knew about this 17:37:23	16 talking about seven arrests a month, so it lacks 17:40:10
17 incident? 17:37:26	17 foundation that all deputies do is make arrests. 17:40:12
18 A How could he not know? 17:37:26	18 THE WITNESS: Can you repeat your question? 17:40:15
19 Q I'm asking you how do you know he knew? Is that 17:37:34	19 MR. IVIE: I don't think that was my question, 17:40:17
20 an assumption you're making? 17:37:38	20 Counselor, but that's okay. I said that -- well, let me 17:40:19
21 A He came to the station right after that 17:37:43	21 have the question read back, Mr. Reporter? 17:40:23
22 incident, and he came to talk to the captain. I just 17:37:46	22 THE COURT REPORTER: "Question: To increase stats is 17:40:31
23 don't see how he wouldn't know about one of his troops 17:37:52	23 to increase arrests; correct?" 17:40:43
24 getting into an incident like that so, yes, I'm assuming 17:37:56	24 THE WITNESS: Yes. 17:40:43
25 he did know. 17:38:01	25 /// 17:40:44
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